

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION

**STIPULATION OF SETTLEMENT OF MOTION OF SANTANDER CONSUMER USA
INC. FOR RELIEF FROM THE AUTOMATIC STAY
AND CO-DEBTOR STAY**

This matter having been brought before the Court on a Motion For Relief From The Automatic Stay And Co-Debtor Stay by William E. Craig, Esquire, attorney for Santander Consumer USA Inc., successor in interest to Gateway One Lending & Finance, LLC (“Santander”), and the Debtor having opposed such motion through her counsel, Brad J. Sadek, Esquire, and the parties having resolved said Motion as hereinafter set forth and by the agreement of all counsel the parties hereby stipulate;

1. That Santander is the holder of a first purchase money security interest in a 2013 Chrysler Town & Country bearing vehicle identification number 2C4RC1BG4DR696713.
2. That the parties stipulate that the Debtor's account with Santander has arrears through November 2020 in the amount of \$8,902.80; that with the addition of counsel fees and costs for the instant motion in the amount of \$431.00, the total amount to be cured is \$9,333.80.

3. That the Debtor is to cure the arrears set forth in paragraph two (2) above by making his regular monthly payment of \$370.95 plus an additional \$1,555.63 each month (total payment of \$1,926.58) for the months of December 2020 through May 2021.
4. That commencing December 2020, if the Debtor fails to make any payment to Santander within thirty (30) days after it falls due, Santander may file a Certification of Default with the Court and serve it on all interested parties. Five days after receipt of said Certification Of Default, the Court shall enter an Order granting relief from the automatic stay and co-debtor stay unless an objection has been filed, specifying the reasons for the objection; in which case the Court will set a hearing on the objection.
5. That the Debtor must maintain insurance on the vehicle. The vehicle must have full comprehensive and collision coverage with deductibles not exceeding \$500.00 each. Santander must be listed as loss payee. If the Debtor fails to maintain valid insurance, or fails to provide proof of same upon request, Santander may file a Certification of Default with the Court and serve it on all interested parties, and the Court shall enter an Order granting relief from the automatic stay and co-debtor stay.
6. That the parties agree that a facsimile signature shall be considered an original signature.

We hereby agree to the form and entry of this Order:

/s/ Brad J. Sadek
Brad J. Sadek, Esquire
Attorney for the Debtor

/s/ William E. Craig
William E. Craig, Esquire
Attorney for Santander Consumer USA Inc.
successor in interest to Gateway One Lending & Finance, LLC